



August 15, 2018

National Freedom of Information Officer
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2822T)
Washington, DC 20460
(202) 566-1667

Re: Freedom of Information Act Request – Expedited Processing Requested

To Whom It May Concern:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, and the Environmental Protection Agency (“EPA” or “the Agency”) FOIA regulations, set forth at 40 C.F.R. Pt. 2, Friends of the Earth hereby requests various documents, records, and materials between the U.S. Environmental Protection Agency (EPA), including the Office of the Administrator, Office of Pesticide Programs, the Biopesticides and Pollution Prevention Division, Health Effects Division, Pesticide Re-evaluation Division and the lobbyists or individuals representing Syngenta, Bayer CropScience, Bayer AG, BASF, Dow Chemical, DuPont Chemical, Croplife America, Syngenta and Monsanto pertaining to neonicotinoids, chlorpyrifos, glyphosate, endangered species and honey bee health from November 1, 2016 to the present. This request includes documents regarding meetings or communications or other contacts—including meeting minutes and scheduling notes—that any individual from any of the entities listed above arranged or attended with the EPA or that the EPA arranged or attended with any of the listed entities.

Our request includes but is not limited to communications with or by the following individuals employed by or contracted by the above listed entities regarding neonicotinoids, chlorpyrifos, glyphosate, endangered species and honey bee health:

- Nancy Beck, Deputy Assistant Administrator, Office of Chemical Safety, EPA
- Tom Brennan, Acting Director, Science Advisory Board, EPA
- Nancy Gratham, Principle Deputy Associate Administrator, Office of Public Affairs, EPA
- Brittany Bolen, Acting Associate Administrator, Office of Policy, EPA
- Karen Maher, Acting Director, Office of Administrative and Executive Service, EPA
- Tate Bennett, Associate Administrator, Office of Public Engagement and Environmental Education, EPA
- Troy Lyons, Associate Administrator, Office of Congressional and Intergovernmental Relations, EPA
- Richard P. Keigwin, Director, Office of Pesticide Programs, EPA
- Dea Zimmerman, Designated Federal Officer, Office of Pesticide Programs, EPA
- Anna Lowit, Senior Science Advisor, Office of Pesticide Programs, EPA
- Marietta Echeverria, Director, Office of Pesticide Programs, Environmental Fate & Effects Division, EPA
- Mark Corbin, Acting Associate Director, Office of Pesticide Programs, Environmental Fate & Effects Division, EPA
- Kimberly Nesci, Deputy Director, Office of Pesticide Programs, Environmental Fate & Effects Division, EPA
- Robert McNally, Director, Biopesticides & Pollution Prevention Division, EPA
- Anne Overstreet, Acting Deputy Director, Biopesticides & Pollution Prevention Division, EPA
- Dana Vogel, Director, Health Effects Division, EPA

- Elissa Reaves, Associate Director, Health Effects Division, EPA
- Yu-Ting Guilaran, Director, Pesticide Re-evaluation Division, EPA
- Charles “Billy” Smith, Associate Director, Pesticide Re-evaluation Division, EPA
- Edward Barron, Director, Bayer
- Julie Corcoran, Director and Counsel, Federal Affairs and Policy, Bayer
- Christopher Leahy, Vice President, Government Relations and Public Policy, Bayer
- Brian McCullough, Director of Operations, Government Relations, Bayer
- James McVaney, Senior Director, Federal Relations and Policy, Bayer
- Lindsay Morris, Director, Federal Relations & Policy, Bayer
- Peter Stehouwer, Deputy Director, Federal Relations and Policy, Bayer
- Lucas Tomanelli, Deputy Director, Federal Relations and Policy, Bayer
- Ursula Wojciechowski, Deputy Director, Government Relations, Bayer
- Werner Baumann, Chairman, Bayer AG
- Liam Condon, President Crop Science Division, Bayer AG
- Beth Roden, Head of Communications, Crop Science, Bayer
- Utz Klages, Head of External Communications, Bayer
- Atashi Bell, Associate, Government Affairs, BASF
- Jeffery Blackwood, Manager, Government Affairs, BASF
- Steven Goldberg, VP & Deputy General Counsel, Regulatory & Govt. Affairs, BASF
- Elizabeth Odina, Senior Manager, Government Affairs, BASF
- Mark Washko, Head, Federal Government Affairs, BASF
- Dr. Martin Brudermuler, Chairman of the Board, BASF
- Saori Dubourg, Member of Executive Board of Directors, BASF
- Maureen Paukert, Director of Communications, BASF
- Barbara Aguiar, Head of Communications, BASF Crop Protection
- Fran Castle, Plant Science Division, BASF
- Janet Boyd, Director, Government Relations, Dow Chemical
- Constance Cullman, Leader, U.S. Government Affairs, Dow Chemical
- Dennis Deziel, Director, Federal Government Affairs, Dow Chemical
- Katherine English, Director, Government Affairs, Dow Chemical
- Kevin Kolevar, VP, Government Affairs and Public Policy, Dow Chemical
- Colleen Litkenhaus, Director, Trade Management, Dow Chemical
- Megan Provost, U.S. Government Affairs, Dow Chemical
- Lisa Schroeter, Global Director, Trade & Investment Policy, Dow Chemical
- Jim Fitterling, CEO & COO, Dow Chemical
- Peter Holicki, Environment, Health, & Safety Operations, Dow Chemical
- Jarrod Erpelding, North America Communications, Dow Chemical
- Rachelle Schikorra, Government Affairs & Public Policy, Dow Chemical
- Nancy Clark, Leader, Global Government Affairs and Industry Relations, DuPont
- Karis Gutter, Government Affairs, DuPont
- Sara Hopper, Manager, Federal Government Affairs, DuPont
- Kelly Sheridan, Specialist, Government Affairs, DuPont
- Linda Strachan, Director, Federal Government Affairs, DuPont
- Aaron Whitesel, Head, U.S. Government Affairs, DuPont
- Edward Breen, Chair & CEO, DuPont
- Dan Turner, North America Communications, DuPont
- Marie Beletti (Corporate Communications, DuPont
- Laura Peterson, Head, Federal Government and Industry Relations, DuPont
- Mary Kay Thatcher, Senior Lead, Federal Government Relations, DuPont
- Jianxin Ren, Chairman, Governance & Nomination Committee, Syngenta
- Ariel Wiegard, Federal Government Relations, Syngenta

- Paul Minehart, USA Communications, Syngenta
- Kellie Bray, Senior Director, Government Affairs, Croplife America
- Allen Greenwood, Executive VP, Croplife America
- Ethan Mathews, Director, Government Affairs, Croplife America
- Jay Vroom, President & CEO, Croplife America
- Jim Blome, Chair of the Board, CropScience, Croplife America
- Genevieve O'Sullivan, Director of Communications, Croplife America
- Brett Begemann, Chairman & President, Monsanto
- Michelle Bushore, Secretary & Director, Monsanto
- Sara Miller, Global Communications and Corporate Marketing, Monsanto
- Trent Lynn Clark, Director, Public and Government Affairs, Monsanto
- Kasey Gillette, Director, Government Affairs, Monsanto
- Michael Holland, Director, Government Affairs, Monsanto
- Scott Kuschmider, Director, Government Relations, Monsanto
- Stephanie Murphy, Director, International Government Affairs and Trade, Monsanto
- Jeremy Stump, VP, North America Government Affairs, Monsanto
- Jim Travis, Director, International Government Affairs and Trade, Monsanto

For purposes of this request, "documents, records, and materials" should be interpreted to include copies of all correspondence, including, but not limited to, telephone logs, phone calls, briefing documents, electronic mail, scheduling notes, meeting minutes, other correspondence between meeting attendees or those who scheduled meetings, and notes documenting any communication (regardless of physical form or characteristics) concerning neonicotinoid, chlorpyrifos and glyphosate pesticides, public-private partnerships and environmental impacts regarding the health of honey bees, other pollinators, endangered species and human health.

Fee Waiver Request

As a non-profit organization, Friends of the Earth also requests a waiver of all fees incurred in providing these records. Disclosure of the requested information "is in the public interest because it is likely to contribute significantly to the public understanding of the operation or activities of the government and is not primarily in the commercial interest of the requester." 5 U.S.C. § 552 (a)(4)(A) (iii) and 40 C.F.R. § 2.107(1). If our request for a fee waiver is denied and any expenses associated with this request are in excess of \$25.00, please obtain our approval before any such charges are incurred.

Disclosure of the requested information would inform the public of governmental activities affecting their food supply, environment and economy. Friends of the Earth is a not-for-profit charitable organization with no commercial interest in the information requested and has relevant expertise in the areas of environment and human health and environmental law. Friends of the Earth has a long and active history in addressing threats to human health and the environment posed by pesticides. Friends of the Earth also has additional relevant experience with research, recommendations and proper implementation of FIFRA and other relevant statutes governing the Trump administration, including the EPA's, consideration of how to protect honey bees, other essential pollinators, endangered species and human health from pesticides, including neonicotinoids, chlorpyrifos and glyphosate.

Further, the information requested would aid Friends of the Earth in understanding government operations or activities regarding EPA's current review of neonicotinoids, chlorpyrifos and glyphosate. The EPA is reviewing and will release a decision soon regarding EPA's Neonicotinoid Risk Assessments (docket identification (ID) number EPA-HQ-OPP-2008-0844-1260, EPA-HQ-OPP-2011-0865-0250, EPA-HQ-OPP-2011-0581-0102 and EPA-HQ-OPP-2011-0920-0623). The public comment period closed on April 21, 2018. Further, the EPA is currently seeking public comment on the National Marine Fisheries Service's (NMFS's) Biological Opinion (BiOp) for the pesticides chlorpyrifos, diazinon, and malathion (docket identification (ID) number EPA-HQ-OPP-2018-0141-0001). The public comment period closed on July 23, 2018. The EPA is reviewing and will release a decision soon regarding EPA's draft human health and ecological risk assessment for glyphosate (docket identification (ID) number EPA-HQ-OPP-2009-0361-0066). The comment period closed April 30, 2018. In addition, EPA revised its human health risk assessment and drinking water exposure assessment for chlorpyrifos and will revise and complete its assessment by October 1, 2022. The EPA will imminently decide if it will take any steps to limit and restrict the use of these pesticides. As the EPA is imminently deciding what actions it will take regarding neonicotinoids, glyphosate, chlorpyrifos and NMFS's BiOp for chlorpyrifos, diazinon, and malathion, we need to verify how frequently EPA and the Office of Pesticides Programs EPA met with the manufactures of these insecticides.

Friends of the Earth seeks to use the information obtained to inform and disseminate it to the public for its use in the risk assessment and review of these pesticides. Friends of the Earth seeks to use this information in recommendations pertaining to open and closed dockets regarding these pesticides and registration review and for further action regarding EPA's policies regarding the assessment of pesticides.

Because of the non-profit, public interest nature of Friends of the Earth, we have extremely limited financial resources with which to cover the copying and search expenses of this request. Our main purpose in requesting the documents is to increase public knowledge and participation in the government process so fundamental to the effective working of a democracy.

Timely Response and Request for Rolling Release

Pursuant to 5 U.S.C. § 552(a)(6)(E)(ii)(I), we expect a response within ten (10) working days of your receipt of this request. If this request is denied in whole or in part, we expect a detailed justification for withholding the records. We also request any segregable portions of records that are otherwise not expected to be disclosed by EPA in response to this request. **Finally, we request that any documents responsive to this request be released by EPA to Friends of the Earth on a rolling basis** rather than EPA holding all of the documents for a one-time release. Friends of the Earth reserves the right to appeal any denial of this request.

Please contact us at the number(s) or email(s) listed below with any questions you may have about the materials we are requesting. Thank you for your immediate attention to this matter.

Sincerely,

Tiffany Finck-Haynes, Senior Food Futures Campaigner, (202)-222-0715, tfinckhaynes@foe.org

Marcie Keever, Legal Director, (510)-900-3144, mkeever@foe.org